

The Honorable Benjamin H. Settle

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE**

SHILLING, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States, et al.,

Defendants.

Case No. 2:25-cv-241

**DECLARATION OF GEIRID
MORGAN IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION**

1. I, Geirid Morgan, declare as follows:

2. My name is Geirid Morgan. I am a plaintiff in the above-captioned action. I have actual knowledge of the matters stated in this declaration.

3. I am a 45-year-old woman, and I live in Silver Spring, MD with my wife and two children.

4. I am a Lieutenant Commander in the U.S. Navy and am currently stationed at the Office of Naval Research in Arlington, VA.

5. I enlisted in the U.S. Navy in 1998 before separating to attend college in 2002. After earning my PhD from the University of Utah, I was commissioned as an Officer and re-entered active-duty service with the Navy in 2015. I have been serving for more than 14 years on active

1 duty.

2 6. I chose the military as a career path because I wanted to be a part of something bigger
3 than myself and have a measurable impact on the world. I was very drawn to being a member of
4 a close-knit team with a clear mission focus. I also come from a military family and so was
5 always attracted to a life in uniform as well as a career in undersea Naval warfare.

6 7. My first military occupational specialty was as an enlisted Navy Diver. I spent over three
7 years forward deployed in support of 6th Fleet undersea mission priorities, including direct
8 support of mission critical security operations immediately following the 9/11 attacks. As an
9 Officer, I serve as a Medical Service Corps Research Physiologist. The Research Physiologist
10 specialty is a highly selective community of fifteen active duty PhD-level scientists. We serve as
11 subject matter experts for human performance/biomedical research efforts with Naval
12 operational relevance. We lead these research efforts; manage research departments and
13 commands that conduct such efforts; and manage and execute research funding for such efforts. I
14 currently work as a Program Officer with the Office of Naval Research where I manage a science
15 and technology funding portfolio that invests in fundamental and applied human physiology and
16 human factors research efforts that aim to fill current and projected U.S. Navy and U.S. Marine
17 Corps operational capability gaps.

18 8. Before my current role, I served as a Company Commander for the School of Medicine
19 within the Uniformed Services University of the Health Sciences (USU) and as a Deputy Dept
20 Head for the Armed Forces Radiobiology Research Institute. Prior to that, I served as a principal
21 investigator at the Navy Experimental Diving Unit where I led several complex human research
22 studies aimed at addressing capability gaps of dive operations in extreme undersea conditions. I
23 further served as military faculty within the Military & Emergency Medicine Department while
24 stationed at USU, and currently maintain an adjunct Assistant Professorship within the USU

1 Preventative Medicine and Biostatistics Department.

2 9. I am transgender. I have known since I was five or six years old that I wanted to live as a
3 woman and routinely engaged in cross-gender play and ideations from that age. As a child
4 growing up in Stone Mountain, GA in the 1980's, I never expressed these thoughts and feelings
5 to the adults in my life for fear of the physical and emotional consequences of doing so. The
6 distress around my gender identity became particularly acute during my adolescent years once
7 my body began to change with puberty. Around this time, I became very disturbed by my
8 inability to quell feelings that I was a girl. I grew very fearful that I would never lead a normal
9 life and be accepted by my family and community. This led to feelings of self-hatred and deep
10 anxiety around my growing interest in the pursuit of gender transition. I coped with this distress
11 by living in the closet for decades, fighting my feelings, and hoping they would disappear over
12 time. I lived like this until the age of forty when I began my social transition under the care and
13 guidance of a behavioral health provider. I started my medical transition in early 2023.

14 10. I have taken legal steps to transition, including changing my legal name and gender in the
15 state of MD; changing my name and gender marker on my MD state driver's license, social
16 security card, passport, and military ID; changing my name on financial accounts; and changing
17 my name and gender marker in the Defense Enrollment Eligibility Reporting System.

18 11. When I came out to my military leadership as transgender in 2023, my commander was
19 very supportive and provided a comfortable affirming work environment for me to begin my
20 gender transition. My unit level supervisors and colleagues were equally supportive and made
21 every effort to make me feel welcome and safe at work. I relied upon that support and the
22 support of military healthcare providers as part of my decision to come out and to transition
23 openly, as this was an incredibly vulnerable time period for me. I now have successfully
24 completed nearly all medical interventions outlined in my Navy-approved gender transition

1 Medical Treatment Plan.

2 12. I have engaged in speech and conduct disclosing my transgender status and expressing
3 my gender identity, including by coming out to my chain of command and my fellow service
4 members, taking steps to transition, and living openly as a woman in military life. I want to
5 continue to be able to engage in speech and conduct disclosing my transgender status and
6 expressing my gender identity.

7 13. Being able to serve openly as a transgender individual has made me a stronger asset to
8 the military. I am able to function as a more productive, healthy member of the military, and I
9 am able to forge stronger relationships with others in my unit as a direct consequence of my
10 engagements with them as my authentic self. Further, since socially transitioning at work, I have
11 been able to trust and depend on those around me in a way that I never could before, and this has
12 resulted in two of my most productive years as a working professional in the military.

13 14. Since the Executive Order banning my service was released, I have felt deeply
14 dehumanized and devalued. As someone who has served my country so well for so long, and
15 whose family relies on my service for their well being, it was particularly difficult to absorb
16 language labeling my identity as not “honorable, truthful” or “disciplined.”

17 15. Involuntary separation from the Navy would cause measurable and immediate harm to
18 my family. My son has a complex metabolic disease that requires specialty treatment. His
19 healthcare is completely covered by TRICARE, which means rapidly losing this benefit of my
20 military service without time to establish continuity of coverage and care would be financially
21 catastrophic for our family and any lapse in care would be detrimental to his health. Likewise, I
22 have been notified by my surgical team at Walter Reed that the final planned procedure from my
23 approved Medical Treatment Plan was cancelled in response to the Executive Order and
24 SECDEF’s memo directing the cessation of all gender-affirming surgeries. This procedure was

1 deemed medically necessary by my healthcare providers. Depriving me of this care puts my
2 health at risk.

3 16. Further, I have made a substantial personal investment in my military career, which has
4 included a tremendous amount of military-specific professional development that does not
5 translate to civilian career fields.

6 17. My professional military experience demonstrates, contrary to assertions within the
7 Executive Order, that transgender service members can be highly capable of performing military
8 jobs. Successful completion of a military career as an Officer, defined here as completion of
9 enough active duty service time to earn military retirement pay, is highly competitive and
10 dependent on an Officer's ability to perform at a high level and attain promotion through the
11 ranks. If an Officer fails to be promoted to a given rank two times in a row, they are involuntarily
12 separated from the military unless retained under a special program or directive. I have a record
13 of performance at a very high level and was successfully promoted to Lieutenant Commander in
14 2023, which is the last promotion I would need to ensure my ability to stay on active duty for
15 twenty years of service and the entitlement to retirement pay.

16 18. My most recent promotion was a major career milestone for me and something for which
17 my family and I have made personal sacrifices. One of the most impactful sacrifices has been
18 geographic stability due to the cross-country moves between duty stations. This has been
19 disruptive to our home life but has also prevented my spouse from establishing her own career,
20 growing her earning potential, and contributing to her own retirement plan or account. We have
21 structured our lives around my military career because we deeply valued our life of service and
22 the mission of my job specialty. We further committed to this career with the hope that I would
23 perform well enough to successfully complete my career and earn retirement pay. The rapid
24 unexpected loss of my military career and entrance to the civilian job market would immediately

1 put me at a competitive disadvantage by forcing me to undergo a considerable amount of re-
 2 training; absorb a subsequent loss of job-entry level and salary potential; and start private
 3 retirement investments from scratch mid-career. These factors alone increase my risk of
 4 spending the remainder of my life far below our current standard of living and having to work
 5 well beyond the age of normal retirement in the US.

6 19. In addition to the distress caused by the pending upheaval to my and my family's lives, I
 7 am deeply concerned about the conditions of military discharge that are called for in the
 8 Executive Order. Its language appears to call for separations from service in other than honorable
 9 conditions, which would not only be disastrous for my life, my career, and my family, but also
 10 be deeply unfair after I have dedicated fourteen years of loyal service to the US Navy and this
 11 Nation.

12 20. These concerns have taken a clear toll on my mental health. I have shifted throughout the
 13 day between high anxiety and extreme hopelessness since the release of the Executive Order. I
 14 have had severe trouble falling asleep and staying asleep within that time frame, and my mind
 15 has been racing with all of the explicit and potential consequences of this Executive Action. I am
 16 fearful that my family is rapidly running out of options to maintain a healthy stable lifestyle in
 17 the future.

18
 19 I declare under the penalty of perjury that the foregoing is true and correct.

20
 21 DATED: February 12, 2025

Geirid Morgan
 Geirid Morgan (Feb 12, 2025 18:45 EST)

Geirid Morgan